

**Rusper Parish Council
Representation of Objection
to
Horsham District Council Regulation 19 Local Plan
February 2024**

Summary

Rusper Parish Council strongly feels that the Regulation 19 version of the new Horsham Local Plan is unsound. The strategic site allocations especially, fail to be legally compliant and Horsham District Council has failed in its duty to fully cooperate when deciding upon these allocations. Horsham District Council has also failed to properly consider the made Rusper Neighbourhood Plan when assessing sites within the Rusper plan area.

The impact of concentrating the greatest level of development in the rural parish of Rusper makes little sense in general planning terms, especially in terms of the coalescence of Crawley and Horsham and the impact on infrastructure provision and most importantly the absence of any connection to a major road.

This Reg19 Local Plan and its evidence base have failings in all the issues fundamental to how the future of the District will be shaped. These provide a valid case for rejecting the current version. We recommend the Local Plan is not approved and a thorough examination is undertaken into its shortcomings.

Rusper Parish Council would like to participate in examination hearing sessions, especially those relating to points raised in this response.

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Key Issues Across the Whole Plan

Below we list the key points of our concerns and objections that make the proposed plan unsound and not compliant with regulation.

The Reg 19 Plan does not outline the long term requirements for the District's strategic developments (specifically HA2) as required by the National Planning Policy Framework¹ (NPPF) paragraph 22. The Plan makes reference to the West of Ifield development being the first stage of a 10,000 housing development that would fundamentally alter the character of the District, but fails to even hint at what other requirements would be needed to support such a fundamental change to the nature of the area. The overall policies should be set within a vision that looks further ahead (at least 30 years), so that the impact of these requirements can be assessed against probable delivery.

Further on, we explain in more detail the reasons why these present a valid case, in planning terms, for rejecting what is currently on the table and for instructing Horsham District Council to reconsider at least the strategic site allocations, especially those in Rusper Parish, in the light of these arguments.

Housing numbers

There are serious problems with the calculation of overall numbers and the emphasis on the Rusper area for allocation, making the coalescence between Horsham and Crawley more likely, and bringing into question the Council's spatial strategy.

The type of housing

There is insufficient social housing allocation compared to the need, even with 40% affordable housing planned for the West of Ifield development.

Transport implications

There is a lack of long term planning for the increased traffic from the strategic sites and how this will be managed at a local level and in relation to broader traffic movements around the district.

There is no coherent strategy for improving buses, rail and active travel (walking and cycling) across the district and a lack of coordination of non-car transport, as required to meet the conclusions of the West Sussex Transport Plan.

The plan lacks an approach to improving safety for recreational road users such as horse riding and carriage driving, cycling and rambling, again as required to meet the conclusions of the West Sussex Transport Plan.

In fact this plan will only exacerbate the issues that the West Sussex Transport Plan highlighted for this area.

Infrastructure provision

The implications of water shortage across the south-east region as a whole and specifically for water taken from the Arun Valley have not been addressed fully in the proposals. Additionally, the probable impact of increased flooding along the River Mole have been ignored. There is also no long term strategy for waste water management and ensuring our waterways stay free from sewage and other waste run-off.

¹ References to the NPPF in this document relate to the December 2023 version that the Local Plan should be judged against.

The long term issues of electrical power production and distribution to support the massive increase in housing proposed in the plan have not been addressed.

The issue of health care both in terms on a much needed new hospital and proper resourcing for local doctors surgeries, especially in new developments have been ignored.

Water neutrality

The specific issues of water neutrality, now a legal requirement for all planning policies, have been ignored, or misinterpreted.

Disregard for made plans and planning assessments

The vision and policies within the made Rusper Neighbourhood Plan have been ignored, as have HDC's own assessments of key strategic sites as 'not developable'.

This disregard for planning policy, extends into a disregard for democracy with election manifesto commitments to protect our countryside and to put residents first (from all parties) being completely abandoned in this plan. The plan also lacks any broader cross-boundary considerations, especially in relation to the environmental risks highlighted elsewhere.

Biodiversity

The scale and variety of habitats across the proposed West of Ifield development have been down played, and its recognition as a Biodiversity Opportunity Area is ignored. The area is written off as low biodiversity without any consideration of the range of protected species, not least the newly discovered network of Bechstein's bat colonies.

Farming and agriculture

The importance of food self-sufficiency, especially at a time of major global climate change has no consideration in the plan. We need to be protecting our farmland for agricultural production and restricting housing developments to already developed areas.

Golf provision

The importance of the existing Ifield Golf Course in terms of golfing sport provision as well as the access to open space that this site provides has been underestimated. There is a thriving golf club that uses the facility and the plans make no provision for a replacement if this land is used for development, despite this being a requirement of the National Planning Policy Framework (paragraph 103). It is clear from the NPPF that there is an obligation to provide an equivalent facility, should the Ifield Golf Course be developed for other purposes.

Environmental Health

The decision to locate a major strategic site so close to Gatwick Airport, will put all those that live there at risk of exposure to noise and other potential pollution risks. This will be an even greater issue if Gatwick's plans for expansion go ahead.

Deliverability

Finally, given the economic climate and the focus of strategic developments around Rusper, the delivery of the proposed housing targets is at risk, and the level of infrastructure and affordable

housing required must pose a huge risk to the viability of the West of Ifield.

Planning Detail For Key Issues

Housing numbers

The way housing provision numbers are calculated and the method for establishing the type of house building provide an important background context to the Reg 19 housing decisions. Flaws and limitations in the way housing provision numbers are calculated and the method for establishing the type of house building are outlined below and provide fundamental points that make the plan unsound.

The calculation of overall numbers

Housebuilding in Horsham over the past 20 years has very little to do with local need, and is almost entirely satisfying the demand from investors and households moving into the area. Horsham's housebuilding targets and delivery are in excess of 900 houses a year and could rise to 1,200 a year if updated with 2021 population census data, and to 1,400 if required to include an extra 200 as Duty To Cooperate with Crawley. This rate of building is completely unrelated to local need, and means Horsham is heading for unsustainable population growth. Horsham's population grew by 11.8% in the 10 years between the 2011 and 2021 ONS censuses, the highest of any local authority (LA) in Sussex or Surrey, and almost double the rate for England and Wales overall of 6.3%.

And going forwards, targets of 900 or 1,200 new houses a year will give us 14% or 18% growth over 10 years respectively.

How can this rate of growth be sustainable given the shortage of water in the south-east region, the inability of water companies to treat sewage safely, and the failure of developers and LAs to deliver the necessary infrastructure? And how does this rate of growth fit with the Council's 30-year vision?

The shocking thing is that this growth is the result of excessive housebuilding. This is nothing to do with building to satisfy local need but is deliberate over-supply, with marketing to create demand from people outside the area. As a result, over 80% of the population growth is due to people moving into Horsham from Crawley (25% of the net inward migration in 2019), south London, Surrey, and other parts of the south-east.

The emphasis on Rusper area for allocation

With the current housing number of approximately 1000 in Rusper Parish, it is self-evident the housing allocation will have an overwhelming impact on the Parish's character and way of life.

However nowhere in the Local Plan nor its evidence base is the housing allocation to Rusper recorded, nor its implications for sustainable development acknowledged, nor remedial actions mentioned. Again, the spatial strategy must be questioned.

The Plan's building proposals on strategic sites for Rusper Parish and its immediate vicinity total approximately 8000 houses (North Horsham with intensification, Kilnwood Vale and West of Ifield) which is around two thirds of the Plan's total housing proposals for the whole district.

The explanation of the Plan's 13212 precise allocation is confused (ref; Strategic Policy 37 Housing §10.21 to 10.26 and Policy 37 strategy box).

However nowhere in the Plan or its evidence base is that huge housing allocation acknowledged nor the rationale for the concentrated development explained.

A pre-condition of the Plan's integrity is a thorough examination of the implications of the planned

building allocation on Ruspur Parish set against the Council's own policies for sustainable development, together with proposals for remedial actions to mitigate the negative impacts.

The strategic development assessments put a lot of emphasis on a policy preference for urban extensions compared with green field developments using claimed NPPF guidelines to support that conclusion. The interpretation of the guidelines is not accurate and is applied selectively.

The amount of housebuilding one area can absorb is limited by demand; the housebuilding industry norm is 300 units a year.

Building out at a rate in keeping with market demand is recognised in the Local Plan for areas of the district that have accommodated large developments in the past (ref; Chapter10 Housing, Strategy box bullet 8).

Supply saturation has been recognised also in the Local Plan's evidence base as reasons for eliminating strategic sites from consideration. An example is Land at Adversane (ref; Horsham Housing Delivery Update November 2023 §4.105) that highlights over supply issues connected with more than one active development.

However, supply saturation in the area of the Local Plan's concentrated strategic developments has not been given consideration. The Local Plan's evidence base does not meet national planning standards because it omits an assessment of combined supply from the three strategic sites (North Horsham, Kilnwood Vale, West of Ifield) set against the areas demand absorptive capacity.

The type of housing

The most pressing need is for social housing in both Horsham and Crawley, where 'social' is defined as 60% of market rents. But developers of strategic sites don't deliver social housing, or even truly affordable housing – they simply add to the over-supply of market housing. Some of this may be called 'affordable' but this means it's made available at 80% of market price or rent, and when prices are so over-inflated a 20% reduction does not make these new houses affordable for those in most need or for first time buyers.

- Local authorities need to be empowered to build more affordable, good quality homes at scale, and fast, where these are locally needed.
- A change in council housebuilding is required to boost housing supply, help families struggling to meet housing costs, and tackle housing waiting lists. The stock of social homes has significantly reduced as councils have struggled to replace homes lost through Right to Buy. The housing shortage has seen rents and property prices rise significantly faster than incomes, acutely impacting the lowest income and vulnerable families and individuals. Compared to the private rental sector and homes at affordable rent, social homes provide a genuinely affordable alternative and greater security of tenancy. There are currently not enough social homes to meet current demand.
- Over 1.2 million households are on the waiting list for social homes in England. While almost 100,000 households are living in temporary accommodation, including 120,710 children.
- According to a recent debate in the House of Commons, local authorities need to be empowered to build more affordable, good quality homes at scale, and fast, where these are locally needed.
- A change in council housebuilding is required to boost housing supply, help families struggling to meet housing costs, and tackle housing waiting lists.
- The stock of social homes has significantly reduced as councils have struggled to replace homes lost through Right to Buy.
- For many people, social housing remains the only feasible option due to the widening gap between Local Housing Allowance (LHA) and market rents. There are currently not enough social homes to

meet current demand.

- Local government needs funding to deliver high-quality, climate-friendly social homes. As well as being fundamental to tackling the housing crisis, building social homes would save the public finances by reducing the housing benefit bill and temporary accommodation costs.

Following information is from the Government web site [*Local Authority Housing Statistics data returns for 2021 to 2022*](#)

For the year 2021 to 2022 Authority Housing statistics for Dwelling stock show that Horsham own no social housing as at 31 March 2022 (social or affordable rent) and rely on housing associations to meet their requirements.

- 705 households were on the waiting list (and if you have any rent arrears you cannot be on the waiting list). 172 are homeless (regardless of whether there is a statutory duty to house them)
- 271 Private Registered Provider dwellings let to households

Financial contributions from planning obligations (s106) held at the start of the year was £15 million – of which less than £1 million has been spent.

Transport implications

Increased traffic from the strategic sites

Probably the most unsustainable aspect of the West of Ifield proposal is the broader transport strategy. Access to the site is very poor – it is peripheral to Crawley and remote from any strategic road infrastructure. West of Ifield is the least well connected of all the proposed strategic sites to existing major roads. The current plan does nothing to solve that.

- The roads connecting the site to Crawley or to any major roads have insufficient capacity – they're either country lanes or small suburban roads. In planning terms, the peripheral location of the West of Ifield site does not allow for appropriate opportunities to promote sustainable transport modes and its development would be contrary to both the NPPF sections 108 and 110.
- There are no A or B class roads in or around Rusper Parish, only C, and all are narrow country lanes (5.2m wide or less), lack footpaths (except the junction of Charlwood Road and Ifield Avenue) and are heavily used by agricultural machinery, cyclists and equestrians. The only daily bus route runs along the Charlwood Road. There are several rat-runs through the parish at peak times, which can be very dangerous to residents.
- Rusper's rural road network and roads through its village and isolated settlements are suited to local traffic densities and are unsuited to carrying the density of through traffic. The roads are narrow with blind corners, no lighting, no kerbs and used extensively for recreational purposes (especially cycling & equestrian).
- The capacity of the Parish's road network to carry the increased traffic that the housing allocation will generate and cope with the increase without risks to road safety are matters of deep concern in the light of predictable traffic movements from the three main strategic sites around Rusper.
- In the case of the North Horsham development, the 'rat-running' evidence base demonstrates drivers have a preference at peak times to avoid congestion on the southern approaches to Crawley by using Rusper's road network and this 'rat-running' preference is likely intensify with the convenience of a new multi carriageway road through the West of Ifield estate. In the case of the West of Ifield development, traffic to and from a southerly or westerly direction will have no alternative to using Rusper's road network, and traffic to and from an easterly or northerly direction will have no alternative to using urban residential roads in Crawley Borough.
- Traffic assessments for the strategic developments in Rusper Parish and its immediate vicinity

have been addressed independently of each other, but it is self-evident those assessments are inadequate because the impact of traffic from the Local Plan's building allocation will be cumulative. This cumulative impact is recognised by the Council's policies ref. **Chapter 8: Infrastructure, Transport and Healthy Communities** issue box bullet 7.

- It is our view that the Local Plan is negligent by not giving attention to this matter in order to ensure the Rusper road network has the capacity to safely carry the expected additional density of traffic stemming from the building allocation to Rusper Parish and its immediate vicinity.
- . There is no direct link into Crawley from the proposed HA2 strategic site, meaning that all West of Ifield traffic will be forced to use the existing minor rural roads around the development to access Crawley, Horsham, Gatwick, the A264, A23 and other major routes.

Improvements to buses, rail and active travel

NPPF paragraph 74 states:

The supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns, **provided they are well located and designed, and supported by the necessary infrastructure and facilities (including a genuine choice of transport modes).**

Evidence from similar developments indicate that it will take years for bus companies to extend routes to include West of Ifield and North of Horsham, there needs to be clear commitment to providing routes, before development starts.

To meaningfully increase rail capacity car parks would be needed at the local stations.

Improving safety for recreational road users

All consideration within the plan is to transport and safety within the strategic sites. There is a complete lack of identifying what is needed across the district to generally improve safety and availability for recreational users. Although the provision is fundamentally a responsibility of the highways authority, we would expect the Local Plan to highlight where this relates to other future provisions of the plan.

- Protecting bridleways and pedestrians on existing roads – there is no plan within the HA2 allocation to improve the lack of existing footpaths along narrow rural roads outside of the the site itself.
- There is no consideration of extending existing bridleways and cycle paths to provide a safe connected network for non-motorised transport.

Infrastructure provision

Issues of water shortage across the south-east region

This is mainly caused by lack of investment by the water companies supplying the area. Fixing leaks will not necessarily help as leaking water will find its way back into the water resource the same as rainfall does, so is more an issue of pumping and treatment costs than that of supply. It comes down to too many people coming to the area to occupy all the new houses increasing the demand. Reducing the daily water usage requirement by water saving measures is unlikely to work. Modern living encourages more showering etc than previously. Water saving devices in private houses are likely to be removed by owners to meet their life-style needs.

Increased flooding along the River Mole

Concreting over green fields, that will have soaked up rainfall, with drainage systems that allow rain water to run off quickly to the river Mole will undoubtedly cause more flooding.

Long term strategy for waste water management

The two closest Waste Water Treatment Works (WwTWs), Crawley and Horley, are at capacity and are already discharging sewage into the River Mole beyond their permitted levels in storm conditions. Both are on Thames Water's list of 250 WwTWs to be upgraded, but upgrading is not the same as increasing capacity to deal with thousands of additional houses. It's not clear that there are any plans for new sewage treatment works, just 'improvements' to existing ones, which are unlikely to satisfy the demand and lead to more raw sewage overflowing into our rivers.

The long term issues of electrical power production and distribution

North Horsham development had to modify one of the planning conditions to reduce the number of charging points per property due to the lack of supply but there does not seem to be any reference to how this has been resolved.

With the future reliance on green electricity as fuel for heating the demand for power is only going to increase. North Horsham had a problem relating to lack of power for car chargers, which highlights issues with infrastructure in the area.

Health care

Given Horsham's population growth there is urgent need for improved hospital services in the district, particularly since Crawley Hospital was downgraded, leaving East Surrey Hospital in Redhill, and Worthing Hospital, as prime medical sites to serve much of West Sussex. Horsham residents are facing a 45-minute journey to get emergency care. East Surrey Hospital cannot cope with the demand generated by the level of development in the region, but there are no plans for a new hospital. Access to East Surrey Hospital is difficult with constant congestion in the area, limited parking at the hospital and poor public transport (which itself gets caught up in the traffic).

Former Horsham councillor Christine Costin has long championed the need for better medical services. After the Government announced proposals aimed at improving public access to GPs, she reported that "The NHS is crumbling away," and added: "The truth is simple, in and around Horsham we do not have enough GP surgeries, not enough doctors and staff to serve the population." For many years now there have been huge developments in the area without the extra infrastructure to cater for the vast increase in population. "Those surgeries that we have are full to the brim." This must pose a risk to the health and welfare of local residents since health care capacity has not kept pace.

Crawley's GP and dental surgeries are already over-subscribed and national GP, dentist and health staff shortages make change unlikely. Currently it is hard to register with a local preferred GP and people are generally assigned to one – Kilnwood Vale residents are being assigned to GPs in Horsham. And there are no dentists in Crawley taking NHS patients. The new development at Forge Wood has an allocation for a surgery but no GPs will take on the running of the surgery.

This is the situation now – more development in our area will only exacerbate these shortcomings. Further extensive development should not be permitted until the absence of health provision in existing developments has been properly addressed.

Water neutrality

The reg19 Local Plan does not meet national planning tests because its water neutrality strategy:

- (i) is not compliant with the Habitats Regulation
- (ii) contains flaws
- (iii) has omitted oversight systems

We note that lack of water will affect all possible sites in the new plan, it's the excessive house-

building numbers that are the root of the problem.

There are concerns shared by local residents about the Council's commitment to conservation and environmentally sustainable water supply in a stressed geographic region that relies on river water.

Set against that responsibility we have doubts that some areas of the Council's water neutrality are robust. There appears to be a structural flaw that undermines its integrity and over ambitious or unrealistic assumptions that together represent a 'forwards and upwards in all directions at once' solution that will have a low probability of achievement.

On 30 June 2023, the High Court handed down an important decision concerning the interpretation and application of the EU Council Directive 92/43/EEC on the Conservation of Natural Habitats and of Wild Flora and Fauna 1992 (the "Directive") and the Habitats Regulations 2017 (the "Regulations") in the context of the planning application process. The High Court found that the Inspector was correct in finding that a habitat regulations assessment (a "HRA") could be required at the discharge of conditions stage of a planning application, despite one not being specifically required at the outline permission stage. The High Court judgement revealed that HDC misinterpreted the Habitats regulation and consequently the Council's projections of water demand submitted to the Sussex North WRZ and used for determining policies in its strategy were and remain non compliant. The numbers appear to exclude housing on developments with outline planning consent and statements made in the strategy document revealing the misinterpretation of the habitats Regulation appear to confirm that exclusion.

The number of houses excluded from demand projections is not disclosed in the neutrality strategy document. However the numbers are significant totalling several thousand houses.

It also has important implications, in that developments with outline planning consent are required to demonstrate neutrality instead of being available to provide offsetting.

There are three main assumptions that appear over ambitious or unrealistic:

- a. Water usage; 85 litres per day is credit worthy as a target, but over ambitious for conservative planning when set against Southern Water's and Water Resources South East's [WRSE] targets of 100 litres per day by 2040.
- b. Offsetting; given prominence as the means for individual developments to achieve neutrality but both the availability of existing housing to provide offsetting to Horsham District's developments from within the District or from partner Authorities in the WRSE and the deliverability of offsetting are imprecise and uncertain.

Southern Water's Water Resource Management Programme (WRMP) plans by 2038/39 to reduce household demand by 2.28 m litres/day. However the means of reducing that demand are exactly the same as the planned means of achieving offsetting savings in the Water Neutrality Strategy. There is therefore flawed double counting between supply side savings and demand side reductions both used in the Neutrality Strategy for offsetting.

- c. Increased water supply; Horsham District's neutrality is highly dependent on Southern Water's leakage reduction in its Water Resource Management Plan that is out of the Council's control to determine and unexplained in the strategy; alternate means of water supply (rain water harvesting and grey water recycling) are given only vague reference; of particular significance, although WRSE's infrastructure developments plans are impressive they have long time frames stretching out to 2035 or 2075 and increased supply from new infrastructure to counterbalance a deficit in water supply predicted about half way through the duration of the Local Plan is not identified. In addition although Southern Water's WRMP includes plans to lessen stress on the Arun Valley river sources, the timing is uncertain (ref; the Habitats Regulation Assessment §4.8).

It is our view therefore that the Council, in order to embrace its special responsibilities for safeguarding sustainable water supply should address a wide array of issues that make its neutrality strategy vulnerable to non-achievement. It needs to give more attention to the means of controlling and sanctioning performance compared with commitments at the levels of individual developments, Parishes and the County.

Oversight arrangements for individual strategic developments should involve:

- metering infrastructure to measure the development's and its offsetting partner's consumption
- specified consumption limits for each phase of the development
- controls to hold the developer accountable for performance against commitments
- institutionalised sanctions for exceeding commitments

Consideration of oversight systems of those highlighted, or any kind, have been omitted from the Neutrality strategy (ref; reg19 Local Plan Strategic Policy 9 Water Neutrality pages 50 & 51) and consequently there is a high risk that the Council's Neutrality Strategy will fail to safeguard the protected sites of the Arun Valley water source.

Disregard for made plans and planning assessments

Rusper Neighbourhood Plan

Rusper's Neighbourhood Plan (adopted 2021) was based on a high level of participation from the local residents and received the overwhelming backing of the electorate in a referendum, after it had passed examination by the Planning Inspector.

The Neighbourhood Plan's vision is to:

“Value, protect and promote the unique rural parish ... ensuring Rusper remains ... sustainable for people, wildlife and the environment generally.”

The vision includes a key objective to preserve and enhance our green spaces.

As well as it being a legal requirement for Horsham District Council to respect the statutory status of the Rusper Neighbourhood Plan (see Section 70 of the Town and Country Planning Act 1990), the Plan also aligns with the manifesto pledges of the new council leadership and the local councillors and current Government planning policies.

SHELAA

HDC has ignored its own Planning Officers advice given in the latest assessments of all sites to the west of Ifield, which were deemed 'not developable' in the latest 2019 SHELAA.

This judgement was upheld by the Rusper Parish Council site assessments carried out against the same planning criteria as part of the Rusper Neighbourhood Plan process. It concluded for the current HA2 site being put forward by Homes England that:

***This is a green field site and fails virtually all sustainability issues.
It is across a wide range of wildlife habitats and would impact existing wildlife corridors.
There would be a significant loss of bio-diversity especially along Ifield Brook and the River Mole.
This area is identified in the emerging Neighbourhood Plan as an important gap to separate Lambs Green and Faygate from Crawley and more importantly to avoid the convergence of Crawley and Horsham.
There is no identified need from the Housing Needs Assessment for this development.
The recent HDC SHELAA 2018, identified this area as “Not Currently Developable” and Crawley Borough Council have already raised objections to the proposal.
Much of the area between Ifield Brook and the River Mole is a flood zone and development here would seriously impact flood risk further upstream on the River Mole.***

Ifield Golf Course is an important local amenity: loss of this sport and recreation facility would be contrary to HDPF policy 43.

This formed part of the evidence accepted by the Planning Inspector.

Disregard for democracy

The election manifesto pledges of the local Liberal Democrats to protect our countryside and to put residents first has been endorsed by local voters. Likewise, the re-election of the two Conservative councillors in Rusper, who voiced their opposition to the West of Ifield expansion in their campaign literature, indicates a clear democratic mandate to oppose the proposal.

The references to a 10,000 development, that stand squarely against the policies of the District's elected representatives, undermine the democratic processes and indicate the Plan has been influenced by interests that do not have an elected mandate.

Biodiversity

Although situated between Horsham and Crawley, Rusper is a distinctly rural parish. It forms part of the Upper Mole Valley, home to the source of the River Mole, and the Rusper ridge is one of the sources for the River Arun. It is bordered by the High Weald Area of Outstanding Natural Beauty, Warnham, Colgate and Crawley. Its character is one of small, vibrant communities – Rusper village, Lambs Green, Ifield Wood – set in a patchwork of farmland, woodland and semi-wild areas. Heavily used for recreation and exercise, the network of walks includes the Sussex Border Path and a 'green walk' from Rusper through Lambs Green on to Ifield. The successful pubs also add to the rural character. The West of Ifield site is Crawley's only remaining 'rural fringe' and it should be protected for Crawley residents, as stated in Crawley Borough Council's draft Local Plan.

The West of Ifield proposals will be devastating for Rusper parish and for biodiversity. The initial West of Ifield neighbourhood, outlined by Homes England, would occupy 450 acres, land which is currently agricultural, woodland and golf course. The site and its immediate surroundings are comprised of a mosaic of habitats of the Low Weald within the river Mole valley and are typically rich in wildlife. The site is almost surrounded by Local Wildlife Sites and woodland - there is over 74 acres of 'ancient woodland' on the site or immediately adjacent to it, plus another 74 acres of 'priority woodland' – both designated by Defra. That's why 75% of the site is identified as Biodiversity Opportunity Area.

The long term proposal for 10,000 homes (Strategic Policy HA2 paragraph 10.84), would occupy 1,500 acres, around 25% of the parish, with House Copse Site of Special Scientific Interest (SSSI) at its heart.

Although Rusper, like much of Horsham district, is poorly surveyed and under-recorded in terms of species and habitat, everything points to it being rich and valuable. Many rare and protected species have been recorded, including colonies of Bechstein's bats roosting across the proposed development sites. Bechstein's and Barbastelle bats are the qualifying species behind the designation of Ebernoe Common and The Mens as Special Areas of Conservation (SACs) and national bat expert Martyn Cooke² advises:

'When considering its Local Plan, Horsham DC must consider the presence, and importance, of the Bechstein's colony in the area shown above [north of the District and upper Mole Valley]. Large scale development should not be permitted and for small scale developments safeguarding measures should be implemented to ensure compliance with Annex II species legislation, such as minimal lighting etc. It should be pointed out that if the

2 Martyn Cooke is a Natural England licenced bat worker holding both Class 3 and Class 4 bat licences. Since 2012 he has organised the Mole Valley Bat Project which mainly focuses on the local Bechstein's bat population. He is a member of the UK Bechstein's Bat Study Group and the Mole Valley DC Conservation Group. He is also an active member of both Surrey and Sussex Bat Groups.

letter of the European Habitats Regulations were followed, Natural England should designate the area as an SAC.'

In terms of habitat and landscape, expert ecologists and naturalists recognise the value of the area:

'WSCC's Landscape character assessment of West Sussex³ recognises the 'Blocks and strips of interconnecting woodland, including a large number of blocks of ancient woodland ... important for tree species such as small-leaved lime and wild service tree' and that 'some localities retain an enclosed rural character, for instance, west of Ifield.'

'The heavy Wealden clay covering most of our area is not favourable for large scale arable agriculture therefore field sizes have remained small. Ancient Hedgerows and mature hedgerow trees, particularly Oaks have remained intact and the area contains numerous small copses which are all well connected. Large amounts of ancient/semi-ancient woodland also survive as do small field ponds. This mosaic of landscape features is crucial for the Bechstein's to survive and prosper.' Martyn Cooke – Surrey Bat Group'

Farming and agriculture

Britain is running out of land for food and faces a potential shortfall of two million hectares by 2030 according to new research.

- A growing population plus the use of land for energy crops are contributing to the gap.
- The total land area of the UK amounts to over 24 million hectares with more than 75% of that used for farming.
- Overall the UK runs a food, feed and and drink trade deficit of £18.6bn.
- With a population expected to exceed 70 million by 2030, the extra demand for living space and food will have a major impact on the way land is used, the report says.

This new Local Plan, makes no provision for protecting farm land for food production and sacrifices farm land to housing development more than other potential land sources.

Golf provision

Ifield Golf Course is well-used, much-loved and definitely not surplus to requirements. The course is 100 years old, beautifully landscaped with historically important design and provides valuable green space for walkers and dogs. Plus it is part of the Rusper Ridge Biodiversity Opportunity Area bordering Hyde Hill Woods – ancient woodland designated as Local Wildlife Space.

If Homes England are unable to show that the course is surplus to requirements then, as required by the NPPF, an equivalent facility will have to be provided, and will need to be in use before the existing club is closed. This will delay the start of construction on the course by at least 4 years, and potentially longer. This threatens the deliverability and viability of the Plan, if no suitable alternative for the course exists in the area, and has not been considered in relation to this strategic housing allocation.

Environmental Health

The West of Ifield site is Crawley's only remaining 'rural fringe' and should be protected for Crawley residents, as Chesworth Farm is for Horsham residents. It is inconsistent and unreasonable to take away from Crawley residents what Horsham is so carefully protecting for its own.

³ <https://www.westsussex.gov.uk/land-waste-and-housing/landscape-and-environment/landscape-character-assessment-of-west-sussex/> LW4 and LW8.

Deliverability and viability

As noted previously if a new golf course is required this will delay house-building by at least 4 years, or 7 years if done properly.

Similarly, if a new waste treatment facility is needed this would delay the start of building by 10 years.

More generally, this is an expensive site in terms of infrastructure requirements. Is Homes England funding all of this? Their ability to deliver infrastructure is questionable.

It seems that the viability risk for developers has not been adequately assessed and mitigated. There are significant questions on the viability of the West of Ifield:

- a. Which infrastructure will be funded by developers?
- b. How current and future housing market and economic uncertainty issues, particularly given that the Bank of England predicts interest rates will remain high for several years, will hit the borrowing costs of both developers and house buyers?
- c. How the high costs of labour, inputs and borrowing will all lead to developers restricting supply to encourage higher prices, will risk the rate of delivery of new housing?
- d. Is 40% affordable housing really viable (Homes England has committed to at least 35%)?

Rusper Specific Policy Issues

Strategic Policy HA2: Land West of Ifield

This site is misnamed and confusing. The land lies entirely within Rusper Parish and Horsham District. It is also confusing in that a neighbourhood of Crawley already exists called Ifield West, which was developed some years ago as what was seen as the furthest extent to the west that was reasonable given the landscape nature of this area.

The site fails on all of the general issues listed above for the broader issues with the new Horsham Local Plan as proposed.

Specific issues for the HA2 proposals in relation to Rusper parish are detailed below.

Transport Issues

Most specifically, the road network in this area is completely unsuitable for a development of this scale. The site has no access to any A or B roads and the proposed exits at either end of the first phase of the Crawley Western Link will connect to Charlwood Road in the north east (between Ifield Green and Bonnets Lane) and Rusper Road in the south west. Both of these exits are to C grade roads, designated as country lanes with no street lighting or pavements.

The exit to Charlwood Road in the north east does at least join onto Ifield Avenue, which does have lighting and pavement, but again this is a C grade road that provides the key access for existing residential traffic from Ifield and Langley Green into Crawley. Alternative routes from this junction lead down very narrow unlit country lanes to Gatwick along Bonnets Lane to the north and through Charlwood to Redhill and beyond along the third route, again down very narrow unlit country lanes.

The exit to Rusper Road in the south west, will provide the only route for traffic travelling west from the site towards Horsham and beyond. It is entirely along unlit country lanes with no pavements. These lanes are currently well used for recreation activities including cycling, horse riding, carriage driving and hiking.

The adoption of this site as the primary new strategic site for the Horsham Local Plan, makes no

sense, purely on the basis of these highway considerations and especially when other sites with much better connections to A roads were proposed.

Rusper Parish Council commissioned independent expert transport technical advice with respect to the impacts of the proposed HA2 development and the full report is attached (see ***Rusper Parish Council Highways and Transport Technical Advice - August 2023 (plus Appendices).pdf***). It concludes:

In conclusion, and given its peripheral and rural location, the Wol 3k site can be considered unsustainable in transport terms and should the site be included in the Horsham Local Plan, it would only serve to promote the use of the private car.

On review of the transport aspects associated with Strategic Policy HA2 in the Horsham District Local Plan 2021 – 38: Regulation 19 Draft Copy can be considered as aspirational. There is a distinct lack of any robust evidence that the Land West of Ifield does not have a severe impact on the surrounding highway network, or indeed can be delivered in a sustainable manner, and therefore if brought forward the site would be contrary to both the National Planning Policy Framework and current Local Plan Policies as set out in Section 2. As a consequence, Strategic Policy HA2: Land West of Ifield, should not be included within the Final Horsham District Local Plan 2021 – 38.

The HDC [Local Plan review evidence base: Transport Study and Appendices](#) documents highlight major shortcomings in the modelling data used to assess the impact on the road network. Within the executive summary and the 2023 review and the Dec 2022 study, the list of sites used to seed the data seem to have completely ignored the fact that over 5,000 more homes are due to be completed within the plan period at North Horsham and Kilnwood Vale, that will be using the same road network between Crawley and Horsham and through Rusper Parish.

Landscape Issues

In addition to the significant transport issues associated with this site, the impact on the rural nature of the landscape is substantial.

The Rusper Neighbourhood Plan had already established that this area was unsuitable for development, both in the thorough site assessment that confirmed the findings of all previous HDC SHELAAs and in the landscape assessment document both of which formed part of the evidence base for the plan. The Rusper Neighbourhood Plan, passed inspection and received overwhelming public affirmation in the referendum before finally being adopted by Horsham District Council in June 2021. Since then, Horsham District Council have failed to take note of any of the policies and general issues raised in the RNP in relation to the proposed Strategic Site Allocation (HA2), or Settlement Site Allocations (HA15) in the Rusper plan area.

In addition, the Reg 19 Local Plan makes references to major expansion of the West of Ifield development to 10,000 houses. There is no evidence in the Plan or its evidence base to substantiate the expansion. In terms of landscape issues this is significant.

To support the landscape assessment within the Rusper Neighbourhood Plan, especially in relation to the proposed HA2 development, RPC commissioned independent expert landscape advice. The full report is attached (see ***HA2 Independent Landscape Report 2024-02-20.pdf***). It concludes:

8.1 The proposed HA2 allocation for 3,000 homes cannot be considered in isolation from the stated aspiration of the site promoter to deliver 10,000 homes. To seek to do so as the Reg 19 draft Local Plan does is illogical and incompatible with the principles of good planning.

8.2 The development of 3,000 homes as proposed in the draft Local Plan on a rural site of acknowledged landscape sensitivity would inevitably result in adverse landscape and visual effects, which in my view would include many that would be

significant in EIA terms. Insufficient evidence has been provided to demonstrate that these adverse effects could be reduced to an acceptable level through embedded or secondary mitigation measures.

8.3 There is a serious deficit in the level of environmental information available and a lack of clarity over the proposed development including a seriously inadequate masterplan. The extent of these deficiencies is particularly apparent in the context of the stated aspirations to deliver a 'garden town' and a 'landscape-led' development.

8.4 The EIA scoping report gives rise to serious cause for concern over the approach that Homes England proposes to adopt in relation to landscape and visual impact assessment.

8.5 There are significant deficiencies in the Council's sustainability appraisal in relation to the proposed allocation, most notably the attempt to divorce the proposed allocation for 3,000 homes from the linked aspiration by the same promoter for 10,000 homes.

8.6 It is inevitable that the proposed development would result in a loss of tranquillity. In my view the increase in light pollution from residential development of 3,000 homes in this location would be likely to be considerable, and that of the development of 10,000 homes would be correspondingly greater.

8.7 Were development of 10,000 homes to occur, this would result in a coalescence of settlements contrary to current and proposed local plan policy. The likelihood of initial development of 3,000 homes leading to ultimate development of 10,000 homes is substantial.

8.8 The proposed HA2 allocation would conflict with national and local planning policy and guidance for the reasons set out in my report.

8.9 The need for mitigation to address adverse landscape and visual impacts is acknowledged in the EIA scoping report but inadequate information has been provided to establish the nature of the proposed mitigation measures and how effective they might be.

8.10 There is no evidence that landscape and visual impacts have been adequately considered in the current development proposal or that the key 'garden settlement' principle of enhancing the natural environment would be met.

8.11 The draft Local Plan fails the test of soundness in respect of proposed allocation HA2 West of Ifield because:

(3) Appropriate and proportionate evidence on the landscape implications of the proposed development has not been provided; and

(4) Given the strong likelihood that the proposed allocation would be the first step towards the development of circa 10,000 homes across a wider area that would adversely affect the High Weald National Landscape (AONB) and its setting, it does not comply with the requirements of paragraphs 180 and 182 of the NPPF.

Biodiversity and Environmental Issues

There are significant environmental and biodiversity issues relating to the West of Ifield site. Many are covered by studies undertaken by the West of Ifield action group and Rusper Parish Council fully support the findings of their studies and submissions on these points.

Additionally, Rusper Parish Council have produced a document that challenges the biodiversity myths that have been expounded by Homes England in relation to the possibilities for enhancing biodiversity in this area (see *BiodiversityMyth.pdf* attached). The sheer range of habitats across the proposed site, when considered alongside the fact that this is an area identified in the Rusper Neighbourhood Plan as a wildlife corridor and Biodiversity Opportunity Area (see Policy RUS5), suggest that this site is completely unsuitable for development.

Lack of Spatial Planning

In the West of Ifield Master Plan (ref; Strategic Policy HA2: figure 7 page 193), the spatial area of the site and areas of the development's components within the site are not recorded. An example is the footprint of the school and the area of Ifield golf course it occupies.

This omission does not follow good practice and leaves the plan open to manipulation of expectations by the developer for its own purposes.

Strategic Policy HA15: Rusper

This policy identifies two areas close to Rusper village for development:

RS1: Land at Rusper Glebe, 0.6 hectares (12 homes)

and

RS2: Land north of East Street, 0.9 hectares (20 homes)

Both of these allocations fail to meet a range of planning policies as outlined below. More importantly, when considered against other potential sites within the area of the village, there impact is far more severe, but the other sites were ruled out in favour of these with no explanation.

RS1: Land at the Rusper Glebe

RS1: Land at the Rusper Glebe, was assessed as part of the Rusper Neighbourhood Plan and was concluded as not suitable for development. The conclusion of the site assessment was:

This is a green field site and fails virtually all sustainability issues.

It is on an undesignated country lane outside of the built up area on land currently designated as agricultural and used for grazing.

It is more than 2.7 miles from the nearest regular bus service along country lanes with no footpaths.

There are no services to the site and provision of main drainage would be a significant issue.

There is no identified need from the Housing Needs Assessment for this development. This site has been identified as a potential site for future improvements to the sports and social provision for the village.

It was designated as "Sites considered developable 6-10 years" in the HDC 2016 SHELAA report, but this did not consider the need for community facilities.

This site is outside the built-up area of the village and as such fails **Strategic Policy 2: Development Hierarchy** in that it is clearly outside the existing defined built-up area boundary of the village.

It also fails **Strategic Policy 3: Settlement Expansion** in not meeting all of the criteria as required. It fails the first point as the site is not allocated in the Neighbourhood Plan. It fails the third point as the Neighbourhood Plan established that the identified local housing needs have been met. It fails the sixth point in that the development has not conclusively demonstrated that it is water neutral in accordance with other development plan policies.

Mostly however, it fails the fifth point as the development is not contained within an existing defensible boundary and the landscape and townscape character features will not be maintained or

enhanced. This site will affect the significant views identified within the Neighbourhood Plan. It is within the Rusper Village Conservation Area and the development will significantly affect the street scene on the northern approaches to the village. The development will also seriously impact on the setting of the Grade 1 Listed St Mary Magdalene Church and its relationship to the Old Rectory immediately to the west of the proposed site.

Further, a current planning application DC/23/0114, proposes to demolish the wall opposite the site to the front of Ghyll Manor Hotel and replace it with more rural fencing, in order to enhance the rural nature of the street scene, including views on to a currently screened pond that is home to Great Crested Newts. Development of the Rusper Glebe, would have the exact opposite impact on the street scene for this important rural approach to the ancient village.

A development of this nature within the Rusper Village Conservation area will significantly change the settlement character

Also, it seems that another potential brown-field site at Millfield along the Horsham Road, is now coming forward and it is not clear if this was put forward as part of the Local Plan call for sites. This site was ruled out of the Rusper Neighbourhood Plan as, at the time it, was predominantly greenfield development beyond the existing brown-field area. This brown-field site would provide a much more viable option for a development of this size.

RS2: Land north of East Street

RS2: Land north of East Street, 0.9 hectares (20 homes), did not come forward at the time of the Neighbourhood Plan and thus was not assessed at the time.

This site is outside the built-up area of the village and as such fails ***Strategic Policy 2: Development Hierarchy*** in that it is clearly outside the existing defined built-up area boundary of the village.

It also fails ***Strategic Policy 3: Settlement Expansion*** in not meeting **all** of the criteria as required. It fails the first point as the site is **not** allocated in the Neighbourhood Plan. It fails the third point as the Neighbourhood Plan established that the identified local housing needs have been met. It fails the fifth point as the development is **not** contained within an existing defensible boundary and the landscape and townscape character features **will not be maintained or enhanced**, as this site will affect the significant views identified within the Neighbourhood Plan. Finally, it fails the sixth point in that the development has **not** conclusively demonstrated that it is water neutral in accordance with other development plan policies.

Additional Documents

The following documents are attached in support of this representation:

Independent Highways and Transport Technical Advice

Rusper Parish Council Highways and Transport Technical Advice - August 2023 (plus Appendices).pdf

Rusper Neighbourhood Plan Landscape Character Assessment

Appendix H – Landscape Character Assessment and Assessment Of Local Gaps In Plan Area.pdf

Independent Landscape Character Assessment

HA2 Independent Landscape Report 2024-02-20.pdf

Biodiversity Myths

BiodiversityMyth.pdf

Rusper Neighbourhood Plan Site Assessments

Rusper_NP_Site_AssessmentsOct2019.ods